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No residue data were submitted with this Section 18 request.

RCB previously concluded residues would not exceed 10 ppm ethylene bisdithiocarbamate (EBDC) and 0.02 ppm ethylenethiourea (ETU) in or on dates, and 20 ppm EBDC on processed dates as a result of the Section 18 use based on grape and raisin residue data (RCB memo of 7/23/86, F. Suhre, 86-CA-27).

RCB reiterates these residue levels in the absence of mancozeb residue data on dates.

Since dates are not a livestock feed item, we expect no transfer of secondary residues to animals.

CONCLUSIONS AND RECOMMENDATION

We repeat the conclusions as stated in RCB's 7/23/86 memo:

- 1. The residues of concern are mancozeb and its metabolite ETU.
- 2. Analytical methods for determining residues of mancozeb (PAM II, Method III) and ETU (AOAC 14th edition, Method 29.119) are available.
- 3. Residues on fresh and processed dates are not expected to exceed 10 and 20 ppm EBDC respectively and 0.02 ppm ETU as a result of this Section 18 use.
- 4. A reference standard is available for mancozeb from the EPA Pesticide and Industrial Chemical Repository in RTP, NC. No reference standard is available for ETU.

TOX consideration permitting, we have no objections to the issuance of this Section 18 request. An agreement should be made with FDA regarding the legal status of the treated dates in commerce.

cc:Circu, RF, SF, Cheng, §18 F, PMSD/ISB, Mancozeb S.F. RDI:SVHummel:8/28/87:RDSchmitt:8/28/87 TS-769:RCB:RM810:CM#2:Cheng:8/28/87:10